

1 RENE L. VALLADARES  
Federal Public Defender  
2 Nevada State Bar No. 11479  
BRIAN PUGH  
3 Assistant Federal Public Defender  
411 E. Bonneville, Ste. 250  
4 Las Vegas, Nevada 89101  
(702) 388-6577/Phone  
5 (702) 388-6261/Fax  
Brian\_Pugh@fd.org  
6 Attorney for Karen Chapon

7  
8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,  
11 Plaintiff,  
12 v.  
13 KAREN CHAPON,  
14 Defendant.

Case No. 2:20-cr-00286-JCM-NJK  
**STIPULATION TO EXTEND  
MOTION DEADLINES**  
(Second Request)

16 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,  
17 United States Attorney, and Jessica Oliva, Assistant United States Attorney, counsel for the  
18 United States of America, and Rene L. Valladares, Federal Public Defender, and Brian Pugh,  
19 Assistant Federal Public Defender, counsel for Karen Chapon:

20 IT IS STIPULATED AND AGREED that the parties herein shall have to and including  
21 July 31, 2023, to file any and all pretrial motions and notices of defense.

22 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they  
23 shall have to and including August 14, 2023, to file any and all responsive pleadings.

24 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they  
25 shall have to and including August 21, 2023, to file any and all replies to dispositive motions.  
26

1 The Stipulation is entered into for the following reasons:

2 1. The parties are attempting to negotiate a resolution of the case without the need  
3 for trial or pretrial motions. The parties need a short continuance of the motion deadlines to  
4 continue negotiations; however, the defendant needs to maintain her right to file pretrial  
5 motions in the event the negotiations are unsuccessful.

6 2. The defendant is not incarcerated and does not object to the continuance.

7 3. The parties agree to the continuance.

8 4. The additional time requested herein is not sought for purposes of delay, but  
9 merely to allow counsel for defendant sufficient time within which to be able to effectively  
10 complete investigation of the discovery materials provided and to adequately consult with  
11 defendant in order to determine whether the case will ultimately go to trial or be resolved  
12 through a guilty plea.

13 This is the second stipulation to continue filed herein.

14 DATED this 20th day of July, 2023.

15 RENE L. VALLADARES  
16 Federal Public Defender

JASON M. FRIERSON  
United States Attorney

17 By /s/ Brian Pugh

By /s/ Jessica Oliva

18 BRIAN PUGH  
Assistant Federal Public Defender

JESSICA OLIVA  
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 KAREN CHAPON,

7 Defendant.

Case No. 2:20-cr-00286-JCM-NJK

FINDINGS OF FACT, CONCLUSIONS  
OF LAW AND ORDER

8  
9 **FINDINGS OF FACT**

10 Based on the pending Stipulation of counsel, and good cause appearing therefore, the  
11 Court finds that:

12 1. The parties are attempting to negotiate a resolution of the case without the need  
13 for trial or pretrial motions. The parties need a short continuance of the motion deadlines to  
14 continue negotiations; however, the defendant needs to maintain her right to file pretrial  
15 motions in the event the negotiations are unsuccessful.

16 2. The defendant is not incarcerated and does not object to the continuance.

17 3. The parties agree to the continuance.

18 4. The additional time requested herein is not sought for purposes of delay, but  
19 merely to allow counsel for defendant sufficient time within which to be able to effectively  
20 complete investigation of the discovery materials provided and to adequately consult with  
21 defendant in order to determine whether the case will ultimately go to trial or be resolved  
22 through a guilty plea.  
23  
24  
25  
26

The ends of justice served by granting said continuance outweigh the best interest of the public and the defendant in a speedy trial, since the failure to grant said continuance would be likely to result in a miscarriage of justice, would deny the parties herein sufficient time and the opportunity within which to be able to effectively and thoroughly prepare for trial, taking into account the exercise of due diligence.

IT IS THEREFORE ORDERED that the parties herein shall have to and including July 31, 2023, to file any and all pretrial motions and notices of defense.

IT IS FURTHER ORDERED that the parties herein shall have to and including August 14, 2023, to file any and all responsive pleadings.

IT IS FURTHER ORDERED that the parties herein shall have to and including August 21, 2023, to file any and all replies to dispositive motions.

DATED July 24, 2023.

James C. Mahan  
UNITED STATES DISTRICT JUDGE